

Exhibit C

Declaration of Samuel M. Hall

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

N.C., individually and on behalf of A.C., a
minor,

Plaintiff,

vs.

PREMERA BLUE CROSS,

Defendants.

Case No. 2:21-cv-01257 - JHC

**DECLARATION OF SAMUEL M.
HALL FOR ATTORNEY FEES AND
COSTS**

DECLARATION OF SAMUEL J. HALL

1. I am an attorney over the age of 18 years, a member in good standing of the Utah State Bar, am competent to provide this testimony, and I have personal knowledge of the matter of which I declare.
2. I received my J.D. in 2016 from the S.J. Quinney College of Law at the University of Utah. I have practiced law continuously in the State of Utah since 2016.

3. I have worked with Brian S. King since October 2020.

4. Prior to working for Brian S. King, I worked for the Utah Attorney General's Office, clerked for Judge Ryan Harris on the Utah Court of Appeals, and spent time in private practice at McNeil Von Maack.

5. While employed with Brian S. King I have represented ERISA claimants before the district court in several jurisdictions.

6. I am admitted to practice before the state and federal courts in Utah and have been admitted pro hac vice in other states.

7. My current practice consists predominantly of representing ERISA plaintiffs in their denied health, long-term disability, and life insurance claims.

8. My rate for these ERISA cases is \$325.00 per hour.

9. I track the time for cases on which I work, including contingent fee cases.

10. A copy of the ledger for work I performed in this matter follows at the conclusion of this declaration.

11. As indicated in the ledger provided with the Motion for Attorney Fees, I worked 12.1 hours on this matter.

12. The total hours for my work in this matter multiplied by the hourly rate I identified in this Declaration are \$3,932.50.

13. I believe the time I put into the case was necessary to obtain the results we realized in the case and was reasonable and appropriate under the circumstances of this case.

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DATED this 7th day of June, 2023.

s/Samuel M. Hall

Samuel M. Hall¹

Samuel J. Hall Ledger

Date	Activity Details	Time	Rate	Amount
2/24/22	Review of roadmap from record produced by defendants	3.7	\$325.00	\$1,202.50
2/28/22	ECF Emails	0.6	\$325.00	\$195
4/6/22	ECF Emails	2.6	\$325.00	\$845
5/19/22	Discovery review	1.9	\$325.00	\$617.50
5/23/22	ECF emails	2.8	\$325.00	\$910
6/5/22	ECF emails	0.5	\$325.00	\$162.50
		12.1		\$3,932.50

¹ An original signed Declaration shall be retained in the firm's case file.